

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America
v.
Jeffrey PARKER

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 7, 2017 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

Title 21 Section 841(a)(1)

Knowingly and unlawfully posses with the intent to distribute a controlled substance listed under Schedule II, of the Controlled Substances Act, to wit; approximately 11.15 kilograms of Cocaine.

This criminal complaint is based on these facts:

See Attachment 1

☒ Continued on the attached sheet.

Complainant's signature

Michael Higgins, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 6/9/17

City and state: Laredo, Texas

Judge's signature

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

CRIMINAL COMPLAINT

On June 07, 2017 United States Border Patrol Agents arrested Jeffrey Layne PARKER for attempting to smuggle 11.15 kilograms of Cocaine. Border Patrol Agent (BPA) Brandon Ramos, was working his assigned duties at the Border Patrol checkpoint located approximately 29 miles north of Laredo, Texas on Interstate Highway 35. At approximately 6:40 a.m. a 2010 White Ford F-150 Pickup Truck bearing Texas license Plate JNG7160 approached his position at the primary car lane for inspection. He asked the driver, later identified as PARKER, Jeffrey Layne, if he was a United States citizen to which he replied "yes" and handed him his Illinois Commercial Driver License. While he was conducting his inspection of PARKER, BPA Marcos Santos advised him that his canine (Basto) #120819 alerted to the vehicle for the presence of contraband and/or hidden people. He continued asking immigration questions to verify PARKER'S citizenship. BPA Santos then instructed BPA Ramos to send the vehicle to the secondary inspection area for further inspection.

Once in the secondary inspection area, BPA Santos placed the White Ford F-150 Pickup Truck on a vehicle lift to inspect the undercarriage. Upon further inspection of the F-150 pickup truck, Agent Santos noticed metal shavings on the floor and back wall corner inside of the cab of the pickup truck. Agent Santos determined that the metal shavings came from the side wall of the vehicle by the seatbelt assembly and by the factory speakers. A closer visual examination of the speakers revealed that the speaker screws had been tampered and recently removed because they were hand tight. After removing the speakers an unknown substance packaged in black electrical tape was discovered in the rear quarter panels.

At approximately 10:00 a.m. Drug Enforcement Administration (DEA) Special Agent (SA) Michael Higgins and Task Force Agent (TFA) Mark Rocha arrived at the Border Patrol checkpoint located approximately 29 miles north of Laredo, Texas on Interstate Highway 35. DEA Agents removed nine bundles, weighing approximately 11.15 kilograms, from the Ford F-150 pickup truck. The substance in the bundles was field tested by TFA Rocha and witnessed BPA Santos, returning a positive reading for cocaine.

At approximately 11:07 a.m., SA Higgins, TFA Rocha and BPA-Intel Jorge Gonzalez interviewed PARKER. TFA Rocha advised PARKER of his Miranda Rights via DEA-13A, as witnessed by SA Higgins. PARKER waived his right to have an attorney present and was willing to answer questions. During questioning, PARKER acknowledged that he knew he was transporting narcotics, but was doing so in order to pay off a debt owed. SA Higgins and TFA Rocha subsequently took custody of PARKER and transported him to the Webb County Jail pending an initial appearance before a United States Magistrate Judge.